

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

LAKISHA JACKSON

Plaintiff,

v.

Case No.
JURY TRIAL DEMANDED

EVERS RENTALS, ALICE EVERS and
DAVID EVERS,
Defendants.

COMPLAINT

Lakisha Jackson, plaintiff in the above-captioned matter, by her attorney, Michael J. Cohn, as a complaint against the defendants, alleges as follows:

1. This is an action to redress racial discrimination in the provision of housing which arises under Title 42, United States Code, § 1982 and §§3604 and 3612.

Jurisdiction is conferred on this Court by Title 28, United States Code, § 1343(4) and § 2201, and Title 42, United States Code, § 3612.
2. The plaintiff, Lakisha Jackson, is an adult, African-American citizen of the United States, residing in Appleton, Wisconsin.
3. Defendant Evers Rentals owns and leases residential properties in the Appleton, Wisconsin area. Defendants Alice and David Evers are, upon information and belief, husband and wife, white citizens of the United States and reside in the County of Outagamie, State of Wisconsin, and are the owners and rental agents of rental property located at 13 Century Court.

4. On or about March 9, 2008, and thereafter, the defendants refused to rent, refused to negotiate for the rental of, misrepresented the availability of and otherwise made unavailable and denied to the plaintiff rental unit located at the above described property.
5. The plaintiff's race was a factor in the defendants' refusal to negotiate, rent and otherwise make unavailable the subject unit to plaintiff.
6. At the time of defendants' actions, the unit were available for rental, and the plaintiff was ready, willing and able to rent the units at a rental price set by the defendants.
7. In doing the acts and conduct complained of above, the defendants acted intentionally, maliciously and were guilty of willful and wanton disregard of the rights and feelings of the plaintiff.
8. The plaintiff has suffered and continues to suffer loss and injury including pecuniary loss, mental anguish, emotional distress, humiliation and embarrassment as a direct and proximate result of the above-described acts and conduct of the defendants.

WHEREFORE, plaintiff requests that judgment be entered against the defendants as follows:

1. For compensatory damages for the plaintiff as determined by the trier of fact;
2. For punitive damages against the defendants;
3. For plaintiff's costs and disbursements together with reasonable attorneys' fees;
4. For such other relief as the Court deems just and equitable.

Dated at Milwaukee, Wisconsin this 9th day of September, 2009.

COHN LAW OFFICE
Attorney for Lakisha Jackson

/s/ Michael J. Cohn

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